

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
Northern District of Texas

United States of America )  
v. )  
 ) Case No. 6:25-MJ-002-BU  
 )  
 )  
CARMEN ZARATE-ALVARADO )  
 )  
Defendant(s)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of 01/14/25 in the county of Crockett in the  
Northern District of Texas, the defendant(s) violated:

*Code Section*

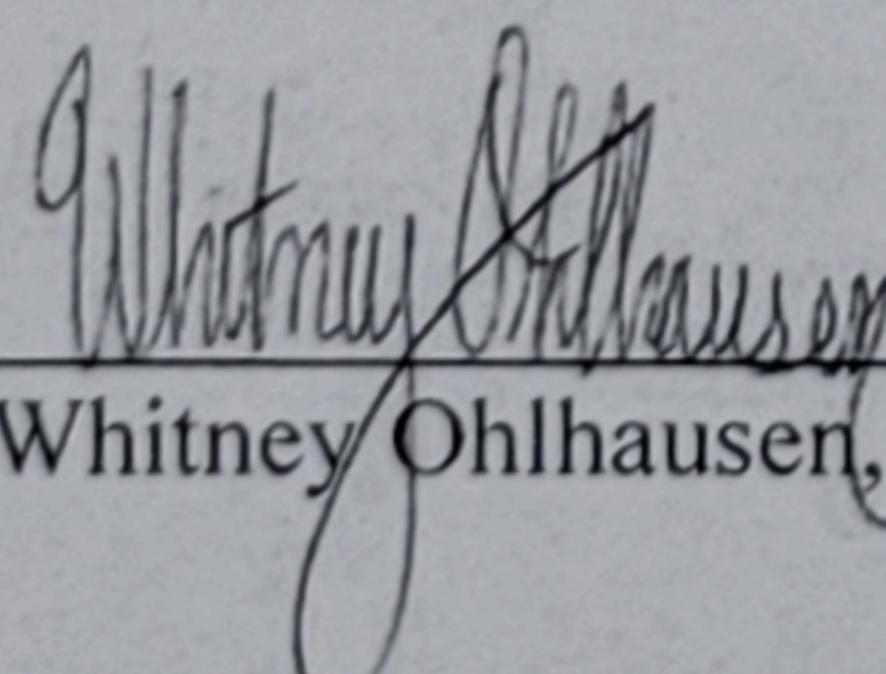
*Offense Description*

Title 8, United States Code, Section 1326      Illegal Re-entry into the United States of a Removed Alien

This criminal complaint is based on these facts:

See attached affidavit.

Continued on the attached sheet.

  
Whitney Ohlhausen, AUSA

  
Complainant's signature

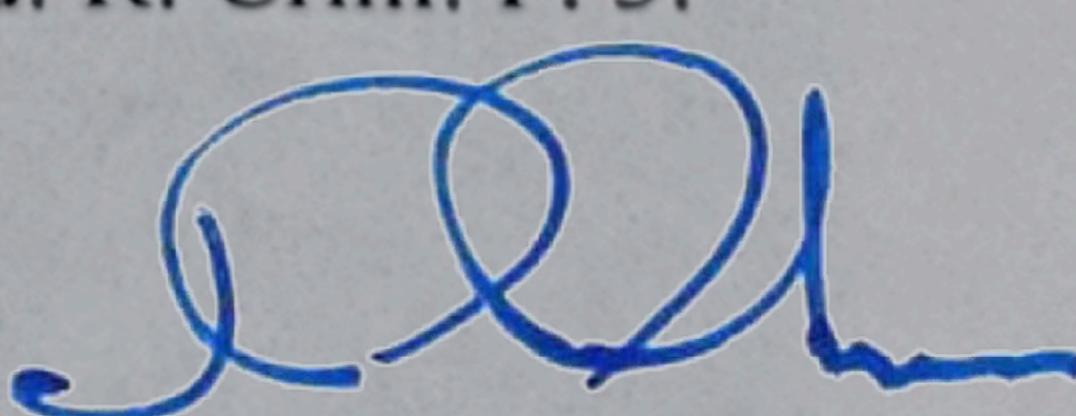
Jeffrey Williams - U.S. Border Patrol Agent

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 3.

Date: January 15, 2025

City and state: Abilene, Texas



Judge's signature

John R. Parker, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

**I. Introduction**

I, Jeffrey Williams, being duly sworn, hereby depose and state as follows:

1. I am a United States Border Patrol agent in San Angelo, Texas. As part of my official duties, I have conducted and participated in investigations relating to Illegal Re-Entry After Deportation. As a U.S. Border Patrol agent, I am authorized to investigate crimes involving Illegal Re-Entry of After Deportation, pursuant to Title 8, United States Code, Section 1326.

2. As a Border Patrol Agent, I am authorized to investigate violations of laws of the United States, and I am a Law Enforcement Officer with the authority to affect arrests and execute criminal complaints and warrants issued under the authority of the United States. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, law enforcement officers and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter.

3. This affidavit is submitted in support of a complaint charging Carmen Zarate-Alvarado with violating Title 8, United States Code, Section 1326, which provides that it is a crime for an alien who has been removed from the United States to enter, attempt to enter, or be found in the United States without the Attorney General of the United States or Secretary of Homeland Security's express consent. Any alien who violates this section of law is subject to prosecution for a felony. Depending on the

circumstances of the removal, conviction could result in a sentence of imprisonment for a period of 2 to 20 years and/or a fine of up to \$250,000.

4. As more fully described below, I have probable cause to believe that Carmen Zarate-Alvarado re-entered the United States after deportation, in violation of Title 8, United States Code, Section 1326.

**II. Facts in Support of Probable Cause**

5. Carmen Zarate-Alvarado (Zarate-Alvarado) is a native and citizen of Mexico by virtue of his birth in Mexico. On January 14, 2025, agents with the Comstock Border Patrol Station were working near Pandale, Texas which is in Crockett County. Crockett County is in the San Angelo Division of the Northern District of Texas. Agents attempted to locate a group of people they had seen walking through the brush. Agents located the group, but the suspects quickly fled on foot. After a short pursuit, agents detained Zarate-Alvarado.

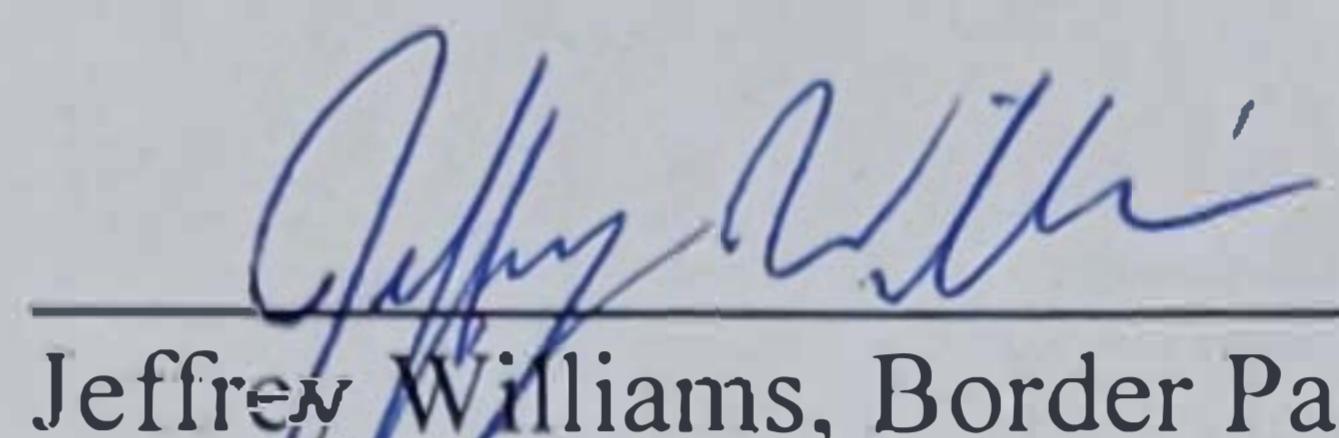
6. Agents questioned Zarate-Alvarado and determined that he was an undocumented alien from the country of Mexico. Zarate-Alvarado was arrested and transported to the Comstock Border Patrol Station.

7. On that same day, Zarate-Alvarado was processed, and full biometric record checks were conducted revealing that he was an undocumented alien who had been previously deported from the United States on or about October 7, 2011, at the Port of Departure in Hidalgo, Texas. Subsequent to this deportation, Zarate-Alvarado illegally entered into the United States on or about January 11, 2025, at or near Lantry, Texas. Records also indicated that he had not received permission

from the Attorney General or the Secretary of Homeland Security to apply for readmission to the United States.

**III. Conclusion**

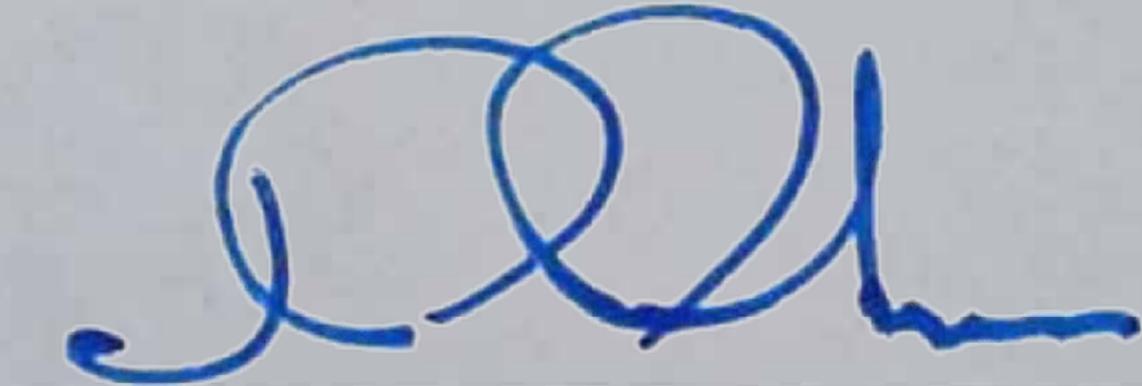
8. Based on these facts, I submit that probable cause exists to believe that Zarate-Alvarado violated Title 8, United States Code, Section 1326.



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Jeffrey Williams, Border Patrol Agent  
U.S. Border Patrol

Pursuant to Federal Rules of Criminal Procedure 4.1 and 41 (d)(3), the undersigned judicial officer has on this date considered the information communicated by reliable electronic means in considering whether a complaint, warrant, or summons will issue. In doing so, I have placed the affiant under oath, and the affiant has confirmed that the signatures on the complaint, warrant, or summons and affidavit are those of the affiant, that the document received by me is a correct and complete copy of the document submitted by the affiant, and that the information contained in the complaint, warrant, or summons and affidavit is true and correct to the best of the affiant's knowledge.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone this 15th day of January 2025.



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Honorable John R. Parker  
United States Magistrate Judge